

OTIF



**ORGANISATION INTERGOUVERNEMENTALE POUR
LES TRANSPORTS INTERNATIONAUX FERROVIAIRES**

**ZWISCHENSTAATLICHE ORGANISATION FÜR DEN
INTERNATIONALEN EISENBAHNVERKEHR**

**INTERGOVERNMENTAL ORGANISATION FOR INTER-
NATIONAL CARRIAGE BY RAIL**

INF. 6

22 January 2008

Original: German

RID/ADR

Joint Meeting of the RID Committee of Experts and the
Working Party on the Transport of Dangerous Goods
(Berne, 25 – 28 March 2008)

Item 2 of the provisional agenda: tanks

**Alignment of approval procedures for tanks transporting Class 3-6, 8 and 9 substances with
the rules in the new sections 1.8.6 and 1.8.7**

Transmitted by the International Union of Private Wagons (UIP)

Background

The conformity assessment and inspection procedures (including supervision of manufacture) defined in sections 1.8.6 and 1.8.7, adopted at the Joint Meeting, only apply to Class 2 tanks. Tanks for substances of classes 3-6, 8 and 9 are not covered by these rules.

This means that manufacturers of tanks and tank-wagons have to pursue different approval channels involving different participants.

Class 2 based on TPED
harmonised procedure in the EU,
mutual recognition and unlimited placing on the market.

Classes 3-6, 8 and 9
national procedures,
no unlimited placing on the market, not even in the EU.

This results, for example, in dual responsibility for manufacturers. Each of the above-mentioned inspection bodies and authorities seeks the mandate to conduct an overarching review (quality assurance system, approval of welding procedures, etc.).

For reasons of cost, only a limited number of copies of this document have been made. Delegates are asked to bring their own copies of documents to meetings. OTIF only has a small number of copies available.

Consequently a Class 3-6, 8 and 9 tank to be manufactured under a national regime in accordance with the old RID is not “interoperable” despite the RID citation in the TSI. While major efforts have been undertaken within the EU to enable wagons to be placed on the market without limitation in the freight sector, using procedures harmonised in a similar manner to 1.8.6 and 1.8.7, this cannot be done with tanks built under unharmonised national regimes.

Proposal

6.8.2.4.5 Amend to read as follows:

“6.8.2.4.5 ~~The tests,~~ **For inspections and checks** (including supervision of manufacture) of tanks in accordance with 6.8.2.4.1 to 6.8.2.4.4 ~~shall be carried out by the expert approved by the competent authority~~ **the procedures described in 1.8.7 shall be applied by the competent authority, its appointed agent or the inspection body accredited in accordance with EN/ISO/IEC 17020:2004 type A as described in 1.8.6.4.** Certificates shall be issued showing the results of these operations. These certificates shall refer to the list of the substances permitted for carriage in this tank or to the tank code in accordance with 6.8.2.3.

A copy of these certificates shall be attached to the tank record of each tank, battery-wagon/battery-vehicle or MEGC tested (see 4.3.2.1.7).”

Assessment

This alignment coupled with appropriate national transposition would restore aligned approval and inspection procedures for Class 2 and other classes by means of harmonisation. The benefits would be:

- Clear responsibilities.
- The option of using tanks for both Class 2 and other classes will be restored.
- There will be no deficiency in technical security because the hazard potential of Class 2 has historically always been rated higher, there are more special provisions and the harmonised approach offers greater transparency. This solution would grant a similar level of security to the other classes.

If TPED is adapted accordingly, a railway tank-wagon would also be interoperable in Classes 3-6, 8 and 9, which is certainly an urgent need. If this cannot be achieved in RID and TPED, it may be worth considering similar amendments to TSI through regulations on dangerous goods.
